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September 4, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

RE: Notice of Ex Parte meeting
Second Application by BellSouth Telecommunications, Inc. and BellSouth
Long Distance, Inc. for Provisioning of In-Region, interLATA Service in
Louisiana, CC Docket No. 98-121

Dear Ms. Roman Salas:

On Thursday September 3, 1998, David Eppsteiner, Steve Garavito, Sharon Norris and I of AT&T and Mike Hunseder of Sidley & Austin met in person with members of the Common Carrier Bureau's Policy and Program Planning Division. C. Michael Pfau, Katherine Dailey, Donna Hassebrock, John Hamman, Michael Lacy, and Jill Williamson, all of AT&T, were also in attendance via teleconference. Members from the Policy and Program Planning Division present for all or parts of the meeting were Andrea Kearney, Michael Pryor, Jake Jennings, Jonathan Askin, Neil Fried, David Kirschner, Claudia Pabo, To-Quyen Truong, Jason Oxman and Bill Bailey. The purpose of the meeting was to discuss an overview of the issues raised in BellSouth Louisiana's aforementioned second application and AT&T's Comments in Opposition to that application. Attached is a brief outline of the presentation submitted during the meeting by AT&T. All of the issues discussed during the meeting are contained in this outline. Also attached is a matrix used during the meeting which correlates AT&T affiants to specific checklist items. Finally, at the staff's request, enclosed also is a document sent by BellSouth to all CLECs on August 11, 1998 outlining BellSouth's position on Intrastate switched access revenue and unbundled network elements

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Two copies of this Notice are being submitted on the following business day to the secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert M. [unclear]", with a stylized flourish at the end.

cc:	Andrea Kearney	Michael Pryor
	Jake Jennings	Jonathan Askin
	Neil Fried	David Kirschner
	Claudia Pabo	To-Quyen Truong
	Jason Oxman	Bill Bailey



BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

Customer Letter / Announcement**SN91081323****Date:** August 11, 1998**To:** All Competitive Local Exchange Carriers**Subject:** CLEC - Intrastate Switched Access Revenue and Unbundled Network Elements

When a carrier purchases Unbundled Network Element (UNE) ports from BellSouth, and intrastate toll (e.g. outside the local calling area) calls are made using these ports, BellSouth will handle the calls as follows:

- a) Originating from UNE and carried by Interexchange Carrier (IXC) -
BellSouth will bill UNE element to CLEC and send access record to the CLEC.
(Currently available)
- b) Originating from UNE and carried by BellSouth (CLEC is BellSouth's toll customer) -
BellSouth will bill resale toll rates to CLEC and send toll record for end user toll billing purposes.
(Currently available)
- c) Terminating on UNE and carried by IXC -
BellSouth will bill UNE element to CLEC and send access record to CLEC.
(Currently available)
- d) Terminating on UNE and carried by BellSouth -
BellSouth will bill UNE element to CLEC and send access record to CLEC.
(BellSouth does not currently bill terminating intrastate access charges associated with the toll calls it carries, and therefore switch recordings for these types of calls are not produced. BellSouth will implement a mechanized capability to provide records for these types of calls by October 31, 1998. Until that time, BellSouth will work cooperatively with the CLECs in applying an alternative process for such.)

BellSouth will not be billing access charges for intrastate toll calls to Interexchange Carriers (IXCs) when placed from or terminated to unbundled ports as described above. All access and toll records referenced in the preceding will be made available to the CLEC on either the Optional Daily Usage File (ODUF), for toll records, or the Access Daily Usage File (ADUF), for access records, as provided for in the appropriate agreements with BellSouth. This procedure does not change the manner in which interstate calls are handled.

BellSouth appreciates the opportunity to continue providing our customers with the best products and services available. Please direct any questions you have regarding this change to your account representative.

Sincerely,

ORIGINAL SIGNED BY JOHN MCCAIN FOR JIM BRINKLEY

Jim Brinkley - Director
Interconnection Services

Reference to AT&T Comments and Affidavits in Docket No. 98-121

Checklist Item	Affidavit	Issue
1. Interconnection	Hassebrock pp. 13-14	BellSouth has failed to provision interconnection trunks in a timely manner and has improperly shut down such trunks.
	Hassebrock pp. 15-16	BellSouth has failed to activate NPA/NXXs and program its switches to route AT&T traffic properly.
2. UNEs	Bradbury <i>seriatim</i>	Lack of nondiscriminatory access to OSS.
	Falcone pp. 7-12	UNE Combinations – BellSouth has a duty to provide CLECs with nondiscriminatory access at any technically feasible point to combine network elements.
	Falcone pp. 32-74	UNE Combinations – Manual recombination of the loop and switching elements through collocation creates significant barriers to entry: <ul style="list-style-type: none"> • Customer service outage (pp. 33-41) • Gating of market entry (pp. 41-64) • Degradation of service to customers (pp. 64-69) • Excessive cost (pp. 69-74)
	Falcone pp. 74-78	UNE Combinations – Collocation imposes additional difficulties for CLECs seeking to combine the switch and dedicated transport or the loop and dedicated transport.

Reference to AT&T Comments and Affidavits in Docket No. 98-121

	Falcone pp. 78-82	UNE Combinations – State commissions have rejected collocation requirements.
	Falcone pp. 82-86	UNE Combinations – Contrary to BellSouth's contention, manual processes involved in a collocation requirement are not "routine" nor regularly used by BellSouth. They are labor intensive, cumbersome, complex and subject to human error.
	Falcone pp. 86-118	UNE Combinations – Alternatives exist to collocation: <ul style="list-style-type: none">• Manual recombination at the MDF (pp. 91-97)• Electronic recombination via recent change (pp. 97-118)
	Bradbury pp. 103-05	According to BellSouth, the only UNEs that can be ordered electronically with EDI-7 are 2-wire analog loop, 4-wire analog loop, 2-wire analog port, INP, and the combination of an analog loop with INP. Of the 67 UNEs offered by BellSouth, BellSouth claims that only 13 can be ordered electronically (5 w/EDI-7 and 8 w/EXACT). BellSouth has not even undertaken to develop any capability for ordering UNE combinations, even though it is required to provide such combinations in Kentucky.
3. Poles, Ducts, Conduits and Rights-of-Way	Comments pp. 69-71	BellSouth "commits" to provide necessary records and capacity determinations on discriminatory time frames. Even these time frames do not appear in the standard license agreement, which states they are subject to negotiation.

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4. Unbundled Loops	<p>Bradbury <i>seriatim</i></p> <p>Bradbury pp. 103-05</p> <p>Falcone pp. 38-69</p> <p>Falcone pp. 23-24, 62-64</p> <p>Reply Comments p. 15</p>	<p>Lack of nondiscriminatory access to OSS.</p> <p>According to BellSouth, the only unbundled loops that can be ordered electronically with EDI-7 are 2-wire analog loop and 4-wire analog loop.</p> <p>Other CLECs have experienced significant problems, including service outages, in obtaining unbundled loops from BellSouth.</p> <p>BellSouth's proposed methods for unbundling IDLC loops are rarely available, impractical and result in significant degradation of the customer's service.</p> <p>BellSouth is not providing access to the xDSL loops and associated electronics necessary to provide advanced services.</p>
5. Unbundled Transport	<p>Bradbury <i>seriatim</i></p> <p>Falcone pp. 74-78</p>	<p>Lack of nondiscriminatory access to OSS.</p> <p>BellSouth's insistence on collocation for CLECs to obtain combinations of the loop and dedicated transport or the switch and dedicated transport is unreasonable, discriminatory and unnecessary.</p>
6. Unbundled Switching	<p>Bradbury <i>seriatim</i></p> <p>Hamman pp. 6-11</p>	<p>Lack of nondiscriminatory access to OSS.</p> <p>BellSouth has not provided records so that CLECs can bill for terminating access and reciprocal compensation.</p>

Reference to AT&T Comments and Affidavits in Docket No. 98-121

	Hamman pp. 13-20	BellSouth is not providing nondiscriminatory access to customized routing, using either line class codes or AIN.
	Hamman pp. 20-25	BellSouth has unreasonably restricted access to all features, functions and capabilities of its switches.
	Hamman pp. 25-26	BellSouth has not demonstrated that it can provide switching unbundled from local loops.
	Hamman pp. 26-28	BellSouth refuses to provide reciprocal compensation for ISP traffic.
	Hamman pp. 28-35	BellSouth has adopted a discriminatory intellectual property restriction that unfairly burdens and impairs the ability to use UNEs and UNE combinations.
7. 911/E911, DA, OS	Hamman pp. 13-20	BellSouth is not providing nondiscriminatory access to customized routing, using either line class codes or AIN.
	Comments pp. 62-63	BellSouth does not provide nonpublished number indicators.
	Comments p. 63 n.19	BellSouth's price for an extract of its directory assistance database is not cost-based as required by the Act.
8. White Pages Listings	Bradbury <i>seriatim</i>	Lack of nondiscriminatory access to OSS.
	Hassebrock pp. 30-31 Bradbury pp. 32-33	BellSouth cannot accept orders for complex directory listings.
	Hassebrock pp. 31-34	BellSouth cannot accept orders using telephone numbers assigned

Reference to AT&T Comments and Affidavits in Docket No. 98-121

	Bradbury pp. 42-44	to the CLEC, and insists on use of Miscellaneous Account Numbers (MANs). BellSouth also has not developed a process to enable AT&T to use MANs on initial orders, thereby forcing AT&T to manually input into its systems MANs received from BellSouth with the FOC.
	Bradbury pp. 29-32	Because of BellSouth's constant changing of business rules relating to inclusion of USOCs on directory listing orders, all directory listing orders must be sent by facsimile.
	Bradbury pp. 46-47	BellSouth has not provided AT&T complete business rules for the submission of directory listing orders.
9. Telephone Numbers	Bradbury p. 89	Using LENS, a CLEC can reserve only 12 telephone numbers, six at a time, and no more than twice in one session. A BellSouth representative can reserve up to 25 telephone numbers at one time.
10. Databases and Signaling	Comments pp. 62-63	BellSouth does not provide nonpublished number indicators.
	Comments p. 63 n.19	BellSouth's price for an extract of its directory assistance database is not cost-based as required by the Act.

Reference to AT&T Comments and Affidavits in Docket No. 98-121

11. Number Portability	Hassebrock pp. 17-23 Bradbury pp. 47-60	BellSouth cannot accept subsequent number portability orders (“partial subsequent migrations”) electronically or manually.
	Hassebrock pp. 23-24 Bradbury p. 33	BellSouth has no standard time for provisioning number portability using Route Indexing – Portability Hub.
	Hassebrock pp. 24-26	BellSouth will not port DID numbers in less than 20-number blocks without directly charging CLEC customers exorbitant “special assembly” charges.
	Hassebrock pp. 26-27 Bradbury pp. 44-45	BellSouth cannot accept disconnect orders for ported numbers.
	Hassebrock pp. 27-29 Bradbury pp. 33-34	BellSouth will not permit advance testing of the electronic interface for ordering permanent number portability.
	Reply Comments p. 32 n.46	BellSouth’s pricing of interim number portability does not comply with the Commission’s rules.
12. Local Dialing Parity		

Reference to AT&T Comments and Affidavits in Docket No. 98-121

13. Reciprocal Compensation	Hamman pp. 6-11	BellSouth has not provided records so that CLECs can bill for terminating access and reciprocal compensation.
	Hamman pp. 26-28	BellSouth refuses to provide reciprocal compensation for ISP traffic.
14. Resale	Comments pp. 71-73	BellSouth does not permit aggregation of traffic to satisfy volume requirements of CSAs, and restricts resale to the specific end user for whom the CSA was established.

AT&T'S Opposition to BellSouth Louisiana's Second Section 271 Application

September 3, 1998



AT&T Digital Link

BellSouth Checklist Deficiencies

- Failure to provide necessary interconnection infrastructure.
- Failure to provide nondiscriminatory interim and permanent number portability.
- Failure to provide nondiscriminatory directory listings.



Partial Subsequent Migrations

- Almost all of AT&T Digital Link customers initially migrate a portion of their local service to AT&T Digital Link to trial the service.
- To complete the transfer of the customer's local services to AT&T, AT&T must issue a partial subsequent migration order.
- If AT&T cannot pass that order, it cannot properly complete the transfer of the customer's local service to AT&T.



Partial Subsequent Migrations

- BellSouth has ignored existing industry standards and required AT&T to enter the main BellSouth billing number as well as the main AT&T listing number in each subsequent order. The problem: only one field.
- For EDI 6.0, a work around was developed using both the LOCBAN field and the Remarks section, which resulted in manual processing by both AT&T and BellSouth.



Partial Subsequent Migrations

- With no prior notice to CLECs, BellSouth implemented EDI 7.0 in such a manner that the work-around results in a “fatal error.”
- BellSouth insists on a completely manual process, but at the time of its filing had not developed or provided M&Ps.
- Impact: AT&T could not submit any subsequent orders for ADL customers.



Inability to Handle AT&T LERG Numbers

- BellSouth is unable to handle AT&T-assigned telephone numbers (AT&T LERG numbers) in its systems.
- In those circumstances, BellSouth insists on use of miscellaneous account numbers.
- Impact: AT&T was forced to develop a method of administering a separate database of BellSouth miscellaneous account numbers. Although AT&T did so, BellSouth could not figure out how to process these numbers.



Disconnect Order Inability

- As of its application, BellSouth had not provided requirements that would enable AT&T to inform BellSouth to process a disconnect of a customer's ported numbers with directory listings.
- Impact: AT&T could not disconnect ported numbers and associated directory listings. If one of our customers changed locations, we could not disconnect the ported numbers.



Complex Directory Listings

- Until July, AT&T and BellSouth had agreed upon a method for associating complex directory listings orders with the ported telephone number order; necessary for BellSouth to complete the order.
- In July, orders began to be rejected. Upon investigation, BellSouth informed AT&T that it implemented new internal system that does not recognize the linkage of these orders and causes the second order (either the directory listing order or the ported number order) to be rejected.
- Impact: Could not place order for any customer that requires a complex directory listing.



Permanent Number Portability

- BellSouth initially agreed to have LRN EDI ordering capability available for end-to-end testing on 4/16/98.
 - “Stare and compare” testing done in April/May.
- BellSouth implemented LRN for Atlanta MSA on 8/31/98, but did not have LRN EDI ordering capability available for full end-to-end testing until two weeks before the implementation date.
- Impact: AT&T could not complete end-to-end testing of EDI ordering interface prior to going live. Neither electronic nor manual LRN orders can be accepted by BellSouth.



Delays in Trunk Provisioning

- AT&T/BellSouth joint planning for interconnection trunks in Florida.
- Two days before planned trial of inbound calling capability, BellSouth advised that trunks would be delayed 30 days because BellSouth was “overwhelmed.”
- Trial delayed three weeks and introduction date of inbound calling capability missed.



Shutdown of 8YY and DID Trunks

- On 6/8/98, BellSouth shut down AT&T's 8YY and DID trunks in Georgia for 14 hours for "nonpayment of bill."
- No bill had ever been presented to AT&T, and, in any event, the interconnection agreement has specific procedures for billing disputes.
- Impact: Customer calls were blocked; evidences BellSouth disregard for CLEC customers.



NPA/NXX Activation and Routing

- AT&T has experienced delays in BellSouth activating AT&T NPA/NXXs in BellSouth switches. Calls could not be completed.
- Calls are now being completed, but testing reveals that they are not being routed properly.
- Impact: Activation failure results in call blockage. Improper routing causes carrier-to-carrier billing problems, double billing by BellSouth to CLECs.



BellSouth's OSS Do Not Provide Non-Discriminatory Access

- BellSouth has not addressed a number of deficiencies identified in the South Carolina and Louisiana I Orders.
 - No proven application-to-application pre-ordering interface.
 - Limited ability to order UNEs electronically.
 - Inadequate flow-through for large classes of orders.
 - Inadequate electronic notification of errors and rejects.
 - No electronic jeopardy notices.



BellSouth's OSS Do Not Provide Non-Discriminatory Access

- BellSouth has not addressed a number of deficiencies identified in the South Carolina and Louisiana I Orders (Cont.).
 - Inadequate documentation of business rules for ordering processes.
 - No comparable data for analogous operations.
 - No data for specific ordering/provisioning intervals.
 - Inadequate change management procedures.
 - Lack of functional parity.



BellSouth's OSS Do Not Provide Non-Discriminatory Access

- **Actual Operational Performance**
 - Pre-Order Response Times
 - Ordering and Provisioning
 - ADL and UNE-P results.
 - Ernst and Young Attestations are Bogus
 - Billing

